

Nanette D. Sanders (State Bar No. 120169)
nanette@ringstadlaw.com
RINGSTAD & SANDERS LLP
4343 Von Karman Avenue
Suite 300
Newport Beach, CA 92660
Telephone: 949.851.7450
Facsimile: 949.851.6926

Special Bankruptcy Counsel for Certain Fire
Damage Plaintiffs/Claimants Relating to the North
Bay Fire Litigation of October 2017 and the Camp
Fire Litigation

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re
PG&E CORPORATION
-and-
PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(LEAD CASE)

(Jointly Administered)

**REQUEST FOR SPECIAL NOTICE AND
INCLUSION ON MASTER MAILING
LIST**

(No Hearing Required)

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

TO THE CLERK OF THE COURT, THE UNITED STATES TRUSTEE, THE DEBTOR AND
ITS COUNSEL OF RECORD, AND TO OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE that, pursuant to Bankruptcy Rule 9010(b), Ringstad & Sanders
LLP, hereby submits this notice in these jointly administered Chapter 11 cases on behalf of
approximately 1,400 individual Plaintiffs/Claimants in pending litigation against the Debtors, for
damages and other relief arising out of or related to, including but not limited to, the "North Bay

Fire Litigation of October 2017”¹, and the “Camp Fire Litigation”².

Pursuant to Bankruptcy Rules 2002, 3017, 4001, 9007 and 9010(b), Ringstad & Sanders LLP hereby requests notice of all matters in the above-captioned Chapter 11 cases which require notice to creditors, to a creditors’ committee, or to other parties in interest, including, without limitation, all notices and papers referred to in Bankruptcy Rules 2002, 3017, 4001, 9007 and 9010(b), copies of all proposed plans and disclosure statements, notices of any orders, applications, complaints, proofs of claim, demands, hearings, motions, petitions, pleadings or requests (whether for relief from stay, adequate protection or otherwise), and other documents brought before the Court in this case, whether formal or informal, whether written or oral, and whether transmitted or conveyed by electronic mail, mail, delivery, telephone, telegraph, telex or otherwise. Ringstad & Sanders LLP requests that such notice be served as follows:

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nanette@ringstadlaw.com
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Neither this request for special notice nor any subsequent appearance, pleading, claim, proof of claim, document or motion, shall (i) expressly or impliedly designate the undersigned

¹ *Marc Alan Belon, et al. v. Pacific Gas and Electric Company, et al.*, CGC-17-562660; *Mark Bowman, et al. v. Pacific Gas and Electric Company, et al.*, Case No. CGC-17-562661; *Mary Bauer, et al. v. Pacific Gas and Electric Company, et al.*, Case No. CGC-18-563953; *Carole Holley, et al. v. Pacific Gas and Electric Company, et al.*, Case No. CGC-18-563951; *Jesse Connolly, et al. v. Pacific Gas and Electric Company, et al.*, Case No. CGC-18-563946; *Nicholas Grimm, et al. v. Pacific Gas and Electric Company, et al.*, Case No. CGC-18-563949; *Charles Lomas, et al. v. Pacific Gas and Electric Company, et al.*, Case No. CGC-18-564647; *Robert Bucher, et al. v. Pacific Gas and Electric Company, et al.*, Case No. CGC-18-564639; *Marla Steele, et al. v. Pacific Gas and Electric Company, et al.*, Case No. CGC-18-564640; *Caitlin Mederos, et al. v. Pacific Gas and Electric Company, et al.*, Case No. CGC-18-564641, and, *Susan Moeckel, et al. v. Pacific Gas and Electric Company, et al.*, Case No. CGC-18-564643, each pending before the Superior Court of the State of California for the County of San Francisco.

² *Rebecca Bausch, et al. v. Pacific Gas and Electric Company, et al.*, 18CV03839; *Mary K. Morrison, et al. v. Pacific Gas and Electric Company, et al.*, 18CV04083; *Lonnie Walker, et al. v. Pacific Gas and Electric Company, et al.*, 18CV03992; *Janice Elaine Adair, et al. v. Pacific Gas and Electric Company, et al.*, 19CV00430; *Michele Aguilar v. Pacific Gas and Electric Company, et al.*, 19CV00332, each pending before Superior Court of the State of California for the County of Butte.

1 agent for service of process of the generally described Plaintiffs/Claimants, or (ii) constitute a
2 waiver of any of the following rights of such Plaintiffs/Claimants:

- 3 (a) Right to have any and all final orders in any and all non-core matters entered only
4 after *de novo* review by the United States District Court;
- 5 (b) Right to trial by jury in any proceeding as to any and all matters so triable, whether or
6 not the same be designated legal or private rights, or in any case, controversy relating
7 hereto notwithstanding any designation of such matters as “core proceedings”
8 pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to
9 statute or the United States Constitution;
- 10 (c) Right to have the reference of this matter withdrawn by the United States District
11 Court in any matter or proceeding subject only to mandatory or discretionary
12 withdrawal; and,
- 13 (d) Other rights, claims, actions, defenses, setoffs, recoupments, or other matters to which
14 the Plaintiffs/Claimants are entitled under any agreements or at law or in equity or
15 under the United States Constitution.

16 All of the above rights are expressly reserved and preserved by such Plaintiffs/Claimants without
17 exception.

18 Dated: February 11, 2019

RINGSTAD & SANDERS LLP

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20 By: /s/ Nanette D. Sanders

21 Nanette D. Sanders
22 Special Bankruptcy Counsel for Certain Fire
23 Damage Plaintiffs/Claimants Relating to the North Bay
24 Fire Litigation of October 2017 and the Camp Fire
25 Litigation
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